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January 31, 2006

## COMPLIANCE LETTER

Ms. Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12th Street, S.W.  
Washington, D.C. 20554

**RE: WC Docket No. 04-36, *In the Matter of IP-enabled Services*; WC Docket No. 05-196, *E911 Requirements for IP-Enabled Service Providers***

Dear Ms. Dortch:

This letter provides an update on progress made by Verizon and Verizon Business<sup>1</sup> in providing E911 capability to the customers of its interconnected VoIP services.<sup>2</sup> Verizon and Verizon Business fully support the Commission's efforts to ensure public safety through its *VoIP 911 Order*.

### Verizon Voice over IP<sup>3</sup>

As previously explained, Verizon Business provides E911 capability to all of its Verizon Voice over IP customers at their fixed locations and has not added new customers to this service after November 28 in areas where it does not have E911 capability.

In addition, as previously explained, on November 28, 2005, we implemented software-based processes that automatically notify Verizon Business when an end user attempts to use his or her IP-enabled CPE at a location other than the subscriber's Registered Location. When

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<sup>1</sup> On January 6, 2006, MCI, Inc. merged into MCI, LLC, a wholly owned subsidiary of Verizon Communications Inc. MCI, LLC business units, and certain other businesses owned by Verizon Communications Inc. that serve enterprise and government customers, call themselves Verizon Business. Verizon Business operating units provide enhanced services and local, long-distance, and other telecommunications services domestically and internationally.

<sup>2</sup> See Letter from Susanne A. Guyer, Verizon, to Marlene Dortch, FCC, WC Docket Nos. 04-36 and 05-196 (filed Oct. 21, 2005); Letter from Richard S. Whitt, MCI, to Marlene Dortch, FCC, WC Docket Nos. 04-36 and 05-196 (filed Oct. 21, 2005).

<sup>3</sup> This service was formerly called "MCI Advantage."

Verizon Business detects that a subscriber may have moved to a new location, Verizon Business suspends service until we are able to confirm that the equipment is still at the same location, or until the customer reestablishes service at a new registered location within our E911 coverage area.

As previously explained, Verizon Business is unable to detect potential moves for a small subset of Verizon Voice over IP subscribers because of a design flaw discovered after November 28.<sup>4</sup> These subscribers continue to have full E911 capability at their Registered Locations in accordance with the *VoIP 911 Order*. Until Verizon Business is able to resolve this situation, these customers are treated as “grandfathered” customers, and Verizon Business will make contributions to the Public Safety Foundation of America and the Fraternal Order of Police Foundation in accordance with MCI’s October 21 Letter. Verizon Business made payments covering the period November 28, 2005 through December 21, 2005 to these organizations on January 25, 2006.

#### Neighborhood Broadband Calling

As previously explained, Verizon provides E911 capability to all of its Neighborhood Broadband Calling customers at their fixed locations and has not added new customers to this service after November 28 in areas where it does not have E911 capability.

In addition, as previously explained, on November 28, 2005, we implemented software-based processes that automatically notify Verizon when an end user attempts to use his or her IP-enabled CPE at a location other than the subscriber’s Registered Location. When Verizon detects that a subscriber may have moved to a new location, Verizon suspends service until we are able to confirm that the equipment is still at the same location, or until the customer reestablishes service at a new registered location within our E911 coverage area.

As noted in MCI’s December letter, Neighborhood Broadband Calling customers may now take advantage of a user-friendly voice-prompt procedure to restore service after service has been suspended because of Verizon’s detection of a potential change in location. The voice prompt obviates the need for customers who have not moved to contact customer service.

#### Verizon VoiceWing

As of January 25, 2006, Verizon is able to offer E911 services to over 45 percent of its customers covered by the Commission’s order. These include customers whose registered locations are in areas served by PSAPs with full E911 capabilities as well as customers served by PSAPs that are connected to selective routers, but that cannot receive and process Registered Location information.

As we previously explained, Verizon is only accepting new customers for VoiceWing service in areas where its vendor is capable of providing E911 services or in areas served by a PSAP that is not connected to the existing Wireline E911 system. Earlier this month, Verizon learned from its third party 911 service vendor that some PSAPs originally classified as

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<sup>4</sup> Letter from Amy Wolverton, MCI, to Marlene Dortch, FCC, WC Docket Nos. 04-36 and 05-196 (filed Dec. 21, 2005).

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providing E911 service on November 28, 2005 had reverted to using administrative lines after November 28, 2005. Because of a delay in notifying Verizon, Verizon accepted a small number of new customers in areas served by these non-E911 PSAPs. The PSAPs in question have now restored E911 service, and Verizon has instituted procedures with its vendor to ensure timely notice of any similar occurrences in the future. Verizon will include an amount in its next contribution for the days during which these customers did not have E911 service.

As confirmed in our November 28 compliance letter, Verizon has implemented an automatic detection capability that will identify when a customer may have moved her or his location. This capability is in place for all existing VoiceWing customers.

Finally, on January 17, Verizon made contributions in equal amounts to the Public Safety Foundation of America and the Fraternal Order of Police Foundation with respect to "grandfathered customers" of VoiceWing for the period from November 28, 2005 through December 31, 2005.

If you have any questions, please do not hesitate to call me.

Sincerely,

A handwritten signature in dark ink, appearing to read "Kathleen Grillo". The signature is written in a cursive, flowing style.

cc: Dan Gonzalez  
Michelle Carey  
Tom Navin  
Kirk Burgee  
Kathryn Berthot  
Janice Myles